



May 8, 2024

Hon. Pamela K. Chen  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Courtroom 4F North  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, *et al.***  
**Case No.: 1:22-cv-1032 (PKC) (JRC) MLLG File No.: 25-2022**

Dear Judge Chen:

I am following up on my previous letter to the court that I sent on January 25, 2024. As you will recall, I am the forensic expert at Berkeley Research Group, LLC ("BRG") that was appointed by the Court as the neutral forensic examiner in the above-captioned matter.

I had previously informed the Court about the unpaid invoices in this matter. I wanted to let you know that IME Watchdog, Inc. has complied with the terms of their agreement with BRG and has been making monthly payments of \$2,000 and recently finished paying their portion of the amount owed to BRG for its services.

However, we have received no additional payments from Defendants in this matter since the order issued by the Court on Sept. 11, 2023, directing "*...both parties to resolve their share of the outstanding bill by 9/25/23 and confirm such resolution by that date, or risk sanctions.*" Defendants still owe BRG **\$32,716.46** in unpaid fees (with their last and only payment having been made more than a year ago on Dec. 29, 2022).

We wanted to email the Court this update, especially in light of the orders that have been issued regarding the pending sale of the Defendants' Staten Island home.

Best regards,

A handwritten signature in blue ink, appearing to read "Ignatius Grande", is written over a horizontal line.

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